



**UNITED  
TECHNOLOGIES  
PRATT & WHITNEY**

400 Main Street  
East Hartford, Connecticut 06108

January 27, 1992

Ms. Lynne Clune  
Engineer  
Waste Engineering and Enforcement Division  
Department of Environmental Protection  
165 Capitol Avenue  
Hartford, CT 06106

Pratt & Whitney  
CTD 990672081  
FILE LOG: R-1B  
OTHER: Corresp  
RDMS # 2314

Re: RCRA Part B Application for Pratt & Whitney East Hartford CTD990672081

Dear Ms. Clune:

Pratt & Whitney would like to take this opportunity to discuss the following issues which will have an impact on our Part B Application submitted to your office on September 5, 1991.

The first issue concerns our Incident Response Plan which will contain our Combined Contingency and SPCC Plan. As indicated in our September 5, 1991 cover letter, we anticipated completion of this document by December 31, 1991. Due to delays in the preparation of this document, we now anticipate completion of this document within the next two months with subsequent submission of the document to your department. As indicated before, the contingency plan included in the Permit Application submittal of September 5, 1991 is the existing plan being utilized at Pratt & Whitney East Hartford.

The second issue concerns the addition of Pratt & Whitney of West Virginia, Inc., Rte. 3, Bridgeport, West Virginia to the list of UTC sites which ship waste to the East Hartford facility. Attached please find a corrected facilities list (Vol. 1, Section B, Page 5) and also the facility waste description for the West Virginia facility (Vol. 1, Section B, Page 10A). The wastes which would be received from this facility are similar or identical to those generated at East Hartford.

In all cases, wastes will be characterized following procedures which are equivalent to those described in Section C of the permit revision dated September 5, 1991 and P&W Item Identification Numbers will be assigned to the wastes and used to track the wastes from generation through disposal.

Thank you for your cooperation and assistance. If you have any questions concerning this response, please contact Bryan Kielbania at 565-0903.

Sincerely,

R. C. Weiss  
Director, Facilities & Services

RCW/BFK/ljs

b-b2a

cc: John Podginski, USEPA  
Dave Wash, CTDEP  
George Dews, CTDEP

The following UTC sites commonly ship waste to the East Hartford Facility:

Pratt & Whitney, Aircraft Road, Middletown, CT

Pratt & Whitney, Washington Avenue, North Haven, CT

Pratt & Whitney, Newell Street, Southington, CT

Pratt & Whitney, Knotter Drive, Cheshire, CT

Pratt & Whitney, Aircraft Road, Southington, CT

Pratt & Whitney, Belamose Avenue, Rocky Hill, CT

Pratt & Whitney, Colt Street, East Hartford, CT

Pratt & Whitney, Pent Road, East Hartford, CT

Pratt & Whitney, Wells Road, North Berwick, ME

United Technologies Research Center, Main Street, East Hartford, CT

International Fuel Cells, Governors Highway, South Windsor, CT

Homogeneous Metals, Main Street, Clayville, NY

Pratt & Whitney, Macon Road, Columbus, GA

Pratt & Whitney, West Palm Beach, FL

Pratt & Whitney, Bridgeport, WV

In addition, wastes may be received from other UTC Divisions such as Hamilton Standard and Sikorsky Aircraft. In all cases, wastes are characterized following procedures which are equivalent to those described in Section C of this Permit Application and P&W Item Identification Numbers are assigned to the wastes and used to track the waste from generation through disposal. The hazardous wastes which may be shipped to the East Hartford Facility from each of these facilities are described in general below:

Pratt & Whitney, Macon Road, Columbus, GA

The Georgia plant manufactures various aircraft jet engine parts and assemblies. Hazardous wastes are generated by fabricating, cleaning, finishing, coating, testing and research operations. These wastes are typically water solutions, both concentrated and dilute, containing acids, alkalis, cyanides, and heavy metals. Also generated are spent solvents and associated still bottoms, waste oils, waste paints, metal hydroxide sludge from an NPDES permitted wastewater treatment facility, and solids and debris contaminated with other wastes, products, solutions, etc.

Pratt & Whitney, West Palm Beach, FL

The West Palm Beach plant is used for the design and development of high performance aircraft jet engines. The development of jet engines is a high technology industry often using "state of the art" materials and processes. Hazardous wastes are generated at this site by fabricating, cleaning, finishing, coating, testing and research operations.

The hazardous wastes generated at this site are typically water solutions, both concentrated and dilute, containing acids, alkalies, cyanides, and heavy metals as well as solids and debris contaminated with these solutions. Also generated are spent solvents and associated still bottoms generated from production operations and reclamation operations, waste oils, waste paints, and miscellaneous commercial chemical products which are off-spec or obsolete.

Pratt & Whitney, Bridgeport, WV

The Bridgeport plant manufactures various small size jet engines. Hazardous waste are generated at this site by fabricating, cleaning, finishing, coating, testing and research operations. The hazardous wastes generated at this site are typically water solutions, both concentrated and dilute, containing acids, alkalies, cyanides, and heavy metals as well as solids and debris contaminated with these solutions. Also generated are spent solvents and associated still bottoms generated from production operations and reclamation operations, waste oils, waste paints, and miscellaneous commercial chemical products which are off-spec or obsolete.

## 2. Description of Hazardous Waste Activities

Hazardous waste activities at the East Hartford Facility are reclamation, transportation and storage. Concentrated and dilute industrial wastewaters are also treated on-site in an NPDES permitted treatment facility. Reclamation is the distillation of spent listed solvents which are generated on-site. P&W has a Hazardous Waste Management Permit (CT HW-264) issued by the Connecticut Department of Environmental Protection for transportation of hazardous waste. P&W transportation of hazardous wastes occurs only between P&W facilities although licensed waste haulers may also be used. Storage occurs for both on-site and off-site material while awaiting treatment or shipment to licensed waste disposal facilities. Treatment occurs by processing both concentrated and dilute wastewater solutions in the NPDES permitted wastewater treatment system.

The facility generates a variety of hazardous wastes. Currently, these wastes are managed in eleven (11) storage tanks (8 above ground and 3 underground) and five (5) container storage areas all located within an area known as the Concentrated Waste Treatment Plant (CWTP). Pratt & Whitney is planning to upgrade these facilities. Design and construction work is in progress with completion scheduled for Summer 1992. Once construction is complete and the facility is fully operational, all RCRA permitted activities will be conducted within it. Therefore, this application covers only the Centralized Waste Storage and Transfer Facility (CWS&TF). If the Centralized Waste Storage and Transfer Facility is not complete when the RCRA Part B Permit is issued, the existing facilities would continue to operate under interim status until such time as the CWS&TF is fully operational. There are no incinerators or boilers for burning waste fuel on-site and no other